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OMB'S PROPOSED GUIDELINES FOR FEDERAL STATISTICAL ACTIVITIES:  
A SUMMARY OF THE CURRENT GUIDELINES, PROPOSED GUIDELINES,  
AND THE PUBLIC RESPONSE TO THE POSSIBLE CHANGES

Prepared at the Request of the Joint Economic Committee

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Congress of the United States

JOINT ECONOMIC COMMITTEE

(CREATED PURSUANT TO SEC. 561 OF PUBLIC LAW 304, 79TH CONGRESS)

Washington, DC 20510

August 16, 1988

To the Members of the Joint Economic Committee:

I am pleased to transmit to you a report on the guidelines for federal statistical activities proposed earlier this year by the Office of Management and Budget ("Guidelines for Federal Statistical Activities; Notice [53 Fed. Reg. 1542-1543]"). It was prepared for the Joint Economic Committee by Alexander Lurie, Senior Research Assistant, Government Division, of the Congressional Research Service.

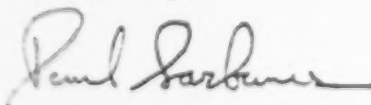
Members of Congress, federal executive agencies, state and local governments and the public have expressed serious concern about the implications of the proposed guidelines for the future of the federal statistical infrastructure. The Committee's purpose in requesting the study was to assure thorough review, both of the proposals themselves and the urgent questions they have raised.

The existing guidelines for the collection, handling, processing and reporting of statistical information have been developed over the course of the past four decades. The sweeping OMB proposal would replace virtually all existing guidelines. In many fundamental respects, the proposal represents a sharp departure from current practices. Yet in the preparation of the guidelines, there was virtually no consultation on the part of OMB with the agencies directly involved in conducting statistical activities.

The issues raised by the OMB proposals, while highly technical, and of concern to professional statistical users, have far broader ramifications; how these issues are resolved will affect many aspects of our daily lives.

Responsible judgment in both the private and public sectors depends significantly on access to accurate, comprehensive and timely statistical information. Good statistics do not guarantee good policies, but they are a part of the framework of decision-making which makes good policies more likely.

Sincerely,



Paul S. Sarbanes  
Chairman

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ABSTRACT

This report provides a summary of OMB's proposed guidelines for federal statistical activities and the public response to them received by OMB during the public comment period. Also, a detailed comparison of the current and proposed guidelines appears in Appendix A.

The author wishes to acknowledge Daniel Melnick and Clay Wellborn, Specialists in American National Government, for their conceptual and editorial assistance.

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## INTRODUCTION

The Paperwork Reduction Act of 1980 [44 USC 3501-3519] authorizes the Office of Management and Budget (OMB) to issue guidelines and standards concerning federal information collection activities. On January 20, 1988, OMB issued a draft circular entitled "Guidelines for Federal Statistical Activities; Notice [53 *Fed. Reg.* 1542-1552]." These guidelines would supercede all existing federal guidelines except "Reports of the Department of Commerce on International Transactions" [43 *Fed. Reg.* 19272] and would cover the statistical activities of many government agencies as well as members of the research community who receive federal funds for their survey activities. OMB is currently reviewing public comments and will issue the final guidelines after this review.

This report provides a summary of these OMB proposed guidelines for federal statistical activities and the response to them received by OMB during the public comment period. In addition, Appendix B contains a comparative, detailed "side-by-side" of the current and proposed guidelines.

## BACKGROUND

In May 1979, the Office of Federal Statistical Policy and Standards (OFSPS) in the Department of Commerce issued the *Statistical Policy Handbook*. This book contained 19 policy directives for the conduct of federal statistical activities. Subsequently, on January 14, 1981, OFSPS issued a revised directive [47 *Fed. Reg.* 3253-3254] entitled "Compilation and Release of Federal Economic Indicators." This directive superceded Directive 3 "Guidelines for the Release of Principal Federal Economic Indicators" and Directive 4 "Prompt Compilation and Release of Statistical Information." This was later revised on September 25, 1985 [*Fed. Reg.* 38932].

Then on August 21, 1981, President Reagan issued Executive Order 12318, which transferred federal statistical policy authority from OFSPS to OMB. President Reagan cited the Paperwork Reduction Act of 1980 as one of the authorities behind this executive order. Subsequently, on May 18, 1982, OMB added business size standards to the statistical guidelines [47 *Fed. Reg.* 21362-21363].

Then on January 20, 1988, OMB issued the above described circular which would rescind 18 statistical policy directives in the *Statistical Policy Handbook* and the relevant circulars. OMB invited agency and public comments until July 15, 1988.

## A SUMMARY OF THE PROPOSED CHANGES

### I. Planning and Standards for Statistical Surveys [Attachment A]

This OMB circular shall require agencies to submit documentation of the following items to demonstrate that the survey has a useful purpose and is designed as efficiently as possible.

1. **The Purpose of the Survey.** This includes its objectives, feasibility, and frequency.
2. **The Survey Design.** This must demonstrate that the data are not available from other sources and that the survey is designed to satisfy the accuracy requirements of the analysis it is intended to support. The design should also show how nonsampling error and the burden on respondents will be minimized.
3. **Reporting the Survey Data.** This includes the procedures of editing, imputation, estimation, benchmarking, and seasonal adjustment. Also, it must list the contents of all the planned products of the survey and the basis for any pledge of confidentiality.

### II. Treatment of Respondents [Attachment B]

These new guidelines would provide more detail than the previous ones. There are five basic proposed guidelines:

1. The sponsor of a survey should provide a potential respondent with the names of all sponsors, the subject matter in detail, whether or not the survey is one-time or periodic, and the intended use of the information.
2. Each agency, in order to ensure the protection of confidentiality and privacy should have written policies describing that the information is only to be used for statistical purposes, the procedures for safeguarding information, and a statement that the agency has resolved any legal questions affecting its ability to prevent public disclosure of information.
3. An agency should meet the following conditions when matching data with administrative records: the match is going to be used exclusively for statistical purposes, the sponsor has informed the respondents that the data shall be used in such a way, and the matching should be documented in the analytical purpose of the survey. This necessitates that the sponsor of the survey must decide whether to match data with administrative records before the survey is designed.
4. The sponsor of a survey should meet the following conditions when using mandatory reporting authority: all people or units of observation should have an equal probability of being selected, a periodic sample should be redrawn at regular intervals not to exceed three

years, and the information respondents are required to provide should only include verifiable factual information.

### **III. Statistical Publications and the Documentation of Methods and Procedures [Attachments C and D]**

The new guidelines call for the following procedures:

1. A professional who was not involved in the preparation of the publication should independently review the study before it is released.
2. Each survey should have a documentation file that includes all procedures relating to the survey, copies of all forms used, and results of evaluations or quality control audits.
3. The presentation of statistics should include estimates of variances and standard deviations, the actual number of observations in each cell, and identification of imputed data.
4. All models, imputation procedures, coding procedures, and procedures used to adjust data acquired through surveys and administrative records should be documented so that a competent professional from outside the agency can understand and duplicate the procedures and results.
5. All procedures should be documented that are used to generate statistical estimates required by statute, by this circular, by Federal agencies who make determinations about benefits, obligations, privileges, or rights of specific individuals or entities.

The circular provides no direction on how the preceding statistical items should be calculated.

### **IV. Compilation, Release, and Evaluation, of Principal Federal Economic Indicators [Attachment E]**

These new guidelines supercede those outlined in 50 *Fed. Reg.* 38932-38934.

1. In the case of estimates based on probability estimates, agencies should publish measures of uncertainty based on sampling variance and consideration of nonsampling errors, e.g., a root mean-square error estimate or its equivalent.
2. In cases where the confidence interval about any single point estimate cannot be estimated, results should be presented only in the form of an "interval estimate."

3. Methods used to estimate upper and lower bound values that define the interval estimate should meet the following objectives: preliminary estimates should include the final point estimate with high probability, the width of the interval should be consistent with the error history of the indicator, and the bound values should be consistent with any confidence interval that can be estimated for components of the indicator.

4. OMB's Statistical Policy Office will evaluate indicators by addressing the following issues: the accuracy and reliability of the series, the documentation, the agency's performance in meeting the designated release schedule guidelines, and the agency's ability to avoid premature disclosure.

#### **V. Uses of Standard Classifications, Data Sources, and Definitions** [Attachment F]

The major changes in this section were in the following areas:

1. **Definition of Poverty.** The new definition of poverty shall be the annual income thresholds that for 1986 and prior years have been published by the Bureau of the Census. For 1987 and subsequent years, the definition of poverty shall be the 1986 thresholds adjusted annually by the consumer price index (CPI) for all consumers.

2. **Racial and Ethnic Categories.** Simply, the new guidelines require the following categories for all statistical purposes:

##### **Racial Categories:**

- American Indian or Alaskan Native
- Asian or Pacific Islander
- Black
- White

##### **Ethnic Categories:**

- Hispanic
- Not of Hispanic Origin

Moreover, agencies should permit individuals to identify themselves as "other." There are no definitions of these categories listed in this circular.

The following three standards were discontinued because they "have not proven useful for the statistical purposes intended:" Standard Industrial Classification of Enterprises; Standard Federal Administrative Regions; and Standard Reference Base Period for Federal Government General-Purpose Index Numbers.

The following two standards were discontinued because they "are used only by one or two agencies to collect and publish statistics:" Standard Gas Pressure Base; Standard Classification of Fields of Science and Engineering.

#### VI. Provision of Statistical Information to International Organizations [Attachment G]

The new guideline essentially dictates that the Director of OMB, with the concurrence of the Secretary of State, will determine what statistical information shall be provided in response to official requests from international organizations.

### GOVERNMENTAL AND PUBLIC COMMENTS ON THE OMB DRAFT CIRCULAR

OMB received numerous letters commenting on the draft circular.<sup>1</sup> The following is a summary of the highlights of these letters in general and by specific attachment.

#### General Comments

On the positive side, many letters applauded OMB's effort to consolidate all appropriate guidelines and requirements for statistical surveys into one document. Also, a few corporations wrote that the proposed guidelines would greatly reduce their response burden in answering statistical surveys.

On the negative side, both government agencies and organizations which conduct surveys for the government on a contract basis objected to the proposed guidelines. The following is a summary of some of these comments:

1. Many government agencies and organizations found the proposed guidelines to be overly detailed, burdensome, and would be costly to implement.
2. They also commented that it is unclear whether the "guidelines" are actually guidelines or "rules" which OMB would strictly enforce in the clearance process.
3. Members of Congress, civil rights agencies, and civil rights groups argued that the elimination of the racial/ethnic definitions and the addition of an "other" category would adversely affect civil rights enforcement and affirmative action programs.
4. Many interested parties wrote that the process that developed the guidelines was flawed because OMB did not consult with any of the affected Federal agencies before issuing them.

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<sup>1</sup>There were a total of 178 letters received in the public OMB docket room as of July 26, 1988. A complete list of these letters can be found in Appendix B.

5. Members of the health, epidemiological, and scientific communities asserted that their data collection activities should be exempt from the proposed guidelines because they are generally smaller and more exploratory than other governmental statistical activities and OMB does not have "competent" personnel to review such surveys.

6. Finally, many groups and individuals protested the new racial and ethnic categories and called for a multiracial or bi-racial category.

#### Comments on Definitions [Circular A]

##### Imputation

- William Kruskal, professor of Statistics at the University of Chicago, wrote that this definition does not seem to include the possibility of creating a new record. Thus, he asked whether official U.S. policy excludes the possibility of creating new records.[Sec. 7d]<sup>2</sup>

##### Sponsor

- Charles R. McClure, professor in the School of Information Studies at Syracuse University, pronounced that the guidelines do not differentiate among requirements that apply to a "sponsoring agency," a "contractor," or a "researcher." [Sec. 7f]
- Percy H. Tannenbaum, professor of Public Policy at the University of California, Berkeley, questioned whether every minor grant that includes a budget for a survey is covered by the circular. [Sec. 7f]

##### Statistics

- The Department of Interior recommended that this term not apply to survey results taken for the internal functioning of an agency. [Sec. 7g]

##### Statistical Purposes

- S.W. Hinkley, Chief of the Statistical Services Section at the Drug Enforcement Administration, stated that this term is not clearly defined. He also thought that it is unlikely that any quantitative information could be used for "nonstatistical purposes." [Sec. 7h]
- The Commerce Department's Patent and Trademark Office (PTO) questioned whether its data collection activities were for statistical purposes.[Sec. 7h]

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<sup>2</sup>The following citations refer to the location of the proposed guideline in 53 Fed. Reg. 1542-1552.

### Statistical Study

- The National Science Foundation (NSF) stated that this term as defined, appears to cover all modelling and projection activities whether or not they were a part of the survey operation.  
[Sec. 7i]
- NSF further asserted that without clarification, there is no limit to the range of OMB review. They suggested that the provision should only apply to statistical studies that are an integral part of a survey in which OMB approval is required.  
[Sec. 7i]
- The PTO questioned whether its statistical activities constituted a statistical study.[Sec. 7i]

### Statistical Survey

- The Internal Revenue Service (IRS) objected to treating the collection of data from administrative records as a statistical survey. [Sec. 7j]
- The State of Connecticut's Office of Policy and Management stated that the definition of this term appears to include the collection of data from administrative records for statistical purposes. If this is the case, they conclude that many requirements relating to the planning of statistical surveys, i.e. frequency, sampling, and response rates, would not be applicable. [Sec. 7j]
- The Department of the Treasury (IRS) corroborated the state of Connecticut's view by writing that "If statistical surveys are defined to include programs based on administrative records, much of the material in Attachment A (and elsewhere) seems contradictory because some of the language is appropriate only for direct surveys."  
[Sec. 7j]
- The Society for Epidemiological Research (SER) commented that section 7.j of the circular "extends the definition of a statistical survey to include compilations of data from administrative records . . . [and these] compilations should be totally exempt from OMB review as they represent no burden for respondents, protection of confidentiality, or legal rationale for inclusion under OMB review." [Sec. 7j]

## I. Comments on Planning Statistical Surveys [Attachment A]

### The Analytical Purpose of the Survey

- The Census Bureau contended that informing respondents about potential matching of survey data to administrative records was "untenable for the decennial census." The Bureau asserted that responses will likely be biased if respondents believe their answers will be shared with other agencies, especially regulatory ones. [Sec. 2a)]
- The U.S. Department of Health and Human Services (HHS) (Office of the Secretary) stated that many data collection activities are meant to provide a broad base of information to use in the future. Thus, documenting the specific analytical purpose of the survey would be difficult.[Sec. 2a]
- Both the NSF and the American Statistical Association (ASA) wrote that this requirement should be general so as to allow the study of continuing and emerging issues and not to deter new general research.[Sec. 2a]
- The Society for Epidemiological Research (SER) argued that "OMB should drop its review requirements for small-scale pretests (500 respondents or fewer) and provide a minimal review for all other pretests." [Sec. 2a]

### The Statistical Objectives of a Survey

- HHS (Office of the Secretary) said "assessment of the accuracy of specific parameters should only be required for those estimates that relate to the specific analytic objectives of the survey. Other aspects of the survey design need only be evaluated in a more general context of potential usefulness." [Sec. 2b]
- Both the National Agricultural Statistics Service (NASS) and Charles R. McClure, professor at the School of Information Studies at Syracuse University, reasoned that documenting this type of detail should not be required for OMB clearance and would stifle new innovative survey methods. [Sec. 2b]
- SER stated that "the specification of accuracy requirements for all estimates [of population, variables, parameters, and their relationships] is unreasonable for small epidemiological studies and surveys." [Sec. 2b]

### Justification of the Proposed Frequency of the Survey

- The Department of the Treasury (IRS) explained that it receives requests for special data tabulations from other agencies and would not have time to justify each request to OMB. [Sec. 2e]

- The Bureau of Justice Statistics (BJS) commented on the guideline that requires the documentation of the notion that measurable changes in phenomena have likely to have occurred before a survey can be launched. It stated that sometimes the purpose of a survey may be to detect that no changes have occurred.[Sec. 2e(1)]
- The Census Bureau and the American Psychological Association contested that the utility of a survey may be to determine that there was no change in phenomena. [Sec. 2e(1)]
- The National Governors Association (NGA) argued that data may need to be collected even if there might be minimal changes in phenomena because "Some data collected on a recurring basis are needed as baseline information or as components of formulas to calculate other quantities." [Sec. 2e (1)]

#### The Survey Design

- The Department of Commerce (Robert Brumley) opposed the guideline that requires documentation of "estimates of the variance of key parameters" in a survey. It further argued that this would only be possible for existing surveys and estimates for new surveys would be "nothing but blind guesses." [Sec. 2f(2)]
- HHS (Office of the Secretary) contended that estimates of variance of key parameters may not be available if the measurement extends into a new topic or sample design. [Sec. 2f(2)]
- The U.S. Department of Defense (DOD) asserted that it would have taken many years to estimate the variances of key parameters for its attitudinal surveys. [Sec. 2f(2)]
- **Nonsampling error.** The following agencies, organizations, and individuals commented negatively on the guideline that requires that the sponsor of a survey document all potential sources of nonsampling error and how it planned to minimize them.<sup>3</sup> [Sec. 2f (4)]

American Association of Dental Schools  
 American Psychological Association  
 American Statistical Association (Monroe Sirken)  
 International Trade Administration  
 National Research Council

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<sup>3</sup>Attachment A, Section 2 (f) (4) requires that "Adequate steps have been taken to minimize the impact of nonsampling error on the estimates derived from the survey data. The documentation shall identify the potential sources of error and give the sponsoring agency's projection of the size of such errors and their impact, individually and in the aggregate, on the estimates. All potential sources of error shall be analyzed . . ."

National Science Foundation  
Society for Epidemiological Research (SER)  
U.S. Bureau of the Census  
U.S. Bureau of Economic Analysis  
U.S. Bureau of Justice Statistics  
U.S. Bureau of Labor Statistics  
U.S. Department of Agriculture (NASS)  
U.S. Department of Commerce (Robert Brumley)  
U.S. Department of Defense  
U.S. Department of Education  
U.S. Department of Energy  
U.S. Department of Health and Human Services (Public Health Service)  
U.S. Department of Health and Human Services (Office of the Secretary)  
U.S. Department of the Interior  
University of Chicago (William Kruskal)  
University of Chicago (Bruce Spencer)

A sample of these comments are:

- The Census Bureau said that this would be impossible for their operations. They stated further that they are not even able to provide this information after data collection. [Sec. 2f(4)]
- The Bureau of Economic Analysis (BEA) contended that this would be very expensive and would likely increase the burden on respondents. [Sec. 2f(4)]
- The Department of Commerce (Robert Brumley) called this requirement "totally open-ended and . . . completely unworkable." [Sec. 2f(4)]
- The DOD argued that these issues could be discussed, but not quantified. [Sec. 2f(4)]
- The Bureau of Labor Statistics (BLS) stated that it did not know of a survey in existence that could meet these standards. [Sec. 2f(4)]
- SER asserted that "OMB should exempt studies with 500 or fewer respondents from this requirement." [Sec. 2f(4)]
- The Census Bureau explained that most of its survey designs come out of the design of the decennial census. Therefore, a cost-benefit analysis of each survey design would place an additional workload on the agency and provide no new information. [Sec. 2f(5)]

- HHS (Office of the Secretary) pronounced that analyzing a range of survey designs for costs and benefits of a large national survey would be very burdensome. It suggested that OMB ask specific questions about the design early in the clearance process. [Sec. 2f(5)]
- DOD recommended that the cost-benefit analysis cover only topics that have never been researched. [Sec. 2f(5)]
- The Department of Education and the Consumer Product Safety Commission explained that analyzing the costs and benefits of pilot projects and small non-recurring surveys would be burdensome and impractical. [Sec. 2f(5)]
- The NSF asserted that this type of analysis for large surveys could constitute a research effort as large as the survey itself. [Sec. 2f(5)]
- The IRS stated that the survey terminology used in this section does not apply to the collection of data from administrative records. [Sec. 2f(5)]
- The Census Bureau contended that documenting their plans for enforcing the penalties for nonresponse for mandatory surveys would compromise the cooperation of those respondents who only participate because of the legal penalties. It also stated that the final decision on this matter rests with the Justice Department. [Sec. 2f(6)]

#### Performance and Quality Measures

- The Consumer Product Safety Commission wrote that these measures should not apply to small surveys. [Sec. 2g]
- The Department of Education suggested that requiring this type of detail would represent a completely new role for OMB in the actual design of surveys and analysis. [Sec. 2g]

#### Disclosure and Control Techniques

- The Census Bureau stated that it could not provide these techniques at the time of clearance because it would not know all the variables in advance. [Sec. 2h]

#### Processing and Reporting of Survey Data

- The Census Bureau stated that it could only document edit and imputation procedures in general. [Sec. 2j(1)]

- HHS (Office of the Secretary) stated that it would be extremely difficult to document all the contents of future analytic reports. [Sec. 2j]
- The Census Bureau declared that it would be impossible to know the contents of all planned products of the decennial census at the time of OMB clearance. [Sec. 2j(3)]
- The BJS and the NSF contended that OMB's requirement of documenting the contents of all planned products of a survey is too restrictive and would prohibit the study of many diverse topics in the future. The NSF suggested that this apply only to survey specific products. [Sec. 2j(3)]
- SER opined that "flexibility is needed in predicting the products of an occupational health effects study." [Sec. 2j(3)]

## II. Comments on Treatment of Respondents [Attachment B]

### Informing Respondents

- Overall, the BLS reasoned that giving the respondent too much information would be even more burdensome and may create fear in the respondents that would ultimately lower response rates. [Sec. 2]
- The DOD contended that providing too much information to respondents could adversely affect phone interviews. [Sec. 2]
- The NSF and the ASA argued that the guidelines for informing respondents of the uses of data and the time horizon of the survey should be made flexible so that researchers may be responsive to changing issues and needs of data users. [Sec. 2]
- The USDA wrote that informing respondents of all the sponsors of a survey would take up a great deal of time and would be burdensome. [Sec. 2a]
- The ASA contended that informing respondents of sensitive topics would be even more time consuming. [Sec. 2b]
- The IRS questioned whether their matching of tax return data with other administrative records would require it to notify each taxpayer. [Sec. 2d(3)]
- The BJS maintained that informing the respondent of possible matches with other agency records may discourage forthrightness especially if the agency is a regulatory one. [Sec. 2d(3)]
- The Commerce Department (Charlie Jones) wrote, in a transmittal form, "We have no plans, at present, to match decennial records with administrative records. For

this reason, we are not recommending modifications to the guidelines to accommodate the decennial [census]." [Sec. 2d(3)]

- NGA wrote that the matching requirement was "unrealistic, greatly restrictive, . . . unduly costly . . . [and] appears to be overly prohibitive when matching data files offers an excellent opportunity to reduce the data burden by allowing agencies to use and share the data already collected." [Sec. 2d(3)]
- On the other hand, Professor Joseph Gastwirth of George Washington University, objected to "the practice of creating linked data set without the knowledge and consent of the individuals to whom the data pertains." He called these linked data sets "Surreptitiously assembled data (SAD) systems" and said that they violate "the implied promise of voluntary participation in a survey . . . [and] . . . the spirit of checks and balances that underlies the foundation of our nation." [Sec. 2d(3)]

#### Protection of Confidentiality and Privacy

- Both Percy H. Tannenbaum, professor of public policy at the University of California, Berkeley, and the USDA explained that the uniform pledge of confidentiality is too long, detailed, and would be difficult to give over the phone. [Sec. 3b(3)]
- The Census Bureau believes that this uniform pledge of confidentiality is not written in "plain English." This would likely create confusion and adversely affect response rates. [Sec. 3b(3)]
- HHS (Office of the Secretary) contended that the uniform pledge of confidentiality is cumbersome and that the concept of "statistical confidentiality" is difficult for intelligent individuals to understand. [Sec. 3b(3)]

#### Designing and Conducting Surveys That Use Mandatory Reporting Authority

- The Census Bureau argued that it deliberately designs economic surveys in a stratified format. This means that it could not comply with the guideline that each respondent have an equal probability of being selected. [Sec. 4a]
- The NSF and the California Employment Development Department disputed the guideline that a new pool of respondents be drawn at least every three years for a survey that uses mandatory reporting authority. They asserted that some institutions such as universities, governments, and large employers must be included in all surveys for data quality purposes. [Sec. 4b]
- The Census Bureau reported that its economic census is conducted every five years, so the samples are redrawn every five years. [Sec. 4b]

- The BEA claimed that the guideline which suggests that mandatory surveys only ask factual questions may preclude asking for estimates which are a part of investment data. [Sec. 4c]
- The Census Bureau noted that a few of the decennial census questions cannot be verified by records. [Sec. 4c]

### III. Comments on Statistical Publications and the Documentation of Methods and Procedures [Attachments C and D]

- SER urged that many of the guidelines in these two attachments should be dropped for studies published in "peer-reviewed" journals."

#### Obligation to Publish

- The NSF made the following recommendations. First, it argued that respondents should be allowed to be identified in a publication if no confidentiality was pledged and the respondents were informed of the publication plans at the time of data collection. Second, notification of suppressed data should be able to be done through a technical note in any publication. Third, the requirement that an agency make no use of suppressed data in any published estimates is impractical and should be deleted. [C, Sec. 2]
- NGA argued that "State/local agencies publish data whether paid for by federal or state funds quite extensively and should not be restricted by federal guidelines." [C, Sec. 2]
- HHS (Office of the Secretary) stated that it would be burdensome to put nonpublished results in a public data base within 90 days. [C, Sec. 2a]
- The Census Bureau asserted that the size of its data bases make it impossible to make data publicly available within 90 days. [C, Sec. 2a]
- Dr. Donald Blaufox of Albert Einstein College of Medicine of Yeshiva University wrote that the 90 days requirement "would tend to deny study investigators--those best qualified to interpret the data--time to complete and publish secondary analyses . . . [and] researchers not involved in a study could simply wait for the completion of long and costly clinical trails--which may require five or even ten years to complete--to request data files shortly after the first report." [C, Sec. 2a]
- The U.S. Department of Education wrote that it would be very costly to identify and inform data users to make them aware that certain data are being suppressed. [C, Sec. 2b(2)(A)]

- The Consumer Product Safety Commission insisted that it would be costly and burdensome to publish a catalog of statistical data files because much data is used internally by the Commissioners. [C, Sec. 2c]

#### Presentation of Statistics

- The NSF made the following complaints and recommendations: 1) the requirements on the presentation of data are too detailed and should be made more general, 2) the provision that the actual number of observations in each cell must be published should be revised to exempt any survey that has a pledge of confidentiality, 3) the guideline that a publication must provide a difference between preliminary and revised data should be changed to a rule that a technical note accompany all revised estimates, and 4) the requirement that each source be documented in a study should be revised to exempt publications that draw on many surveys and sources. [C, Sec. 4]
- The BJS proposed that each agency should decide how best to present their findings. [C, Sec. 4a]
- The Census Bureau called the specifics on table design "unnecessary." [C, Sec. 4a]
- The California Employment Development Department suggested that these requirements only cover publications of Federal statistical programs and that the requirement be satisfied with a reference to Federal publications which estimate and generalize variances. [C, Sec. 4b(1)]
- The Department of Education mentioned that it would be burdensome to provide this type of detail and that measuring variances and standard deviations from samples can lead to overestimating variances or to biases in small sample sizes, time series, and situations requiring model based estimates. [C, Sec. 4b(1)]
- The Census Bureau maintained that it could not comply with the requirement to indicate the percent of data imputed into each cell without twice the current funding. [C, Sec. 4b(3)]
- The IRS declared that coding all imputations would be a "monumental task." [C, Sec. 4b(3)]

#### All Imputation Procedures, Coding Procedures, and Procedures Used to Adjust Data Acquired Through Surveys or Administrative Records

- The Department of the Treasury (IRS) said that documenting all imputation and coding procedures "would be a monumental task that would certainly require additional resources." [D, Sec. 3]

- Richard Savage, Chairman of the Department of Statistics at Yale University, wrote that this demand was excessive and that he had never had a discussion with a Census Bureau official that suggested that they could supply this information in written form.[D, Sec. 3]

#### Models

- BLS admonished OMB that releasing all procedures and techniques so that an outside professional could duplicate the results would adversely affect the Federal statistical system. Its reasoning was that some outside professionals may fail to accurately duplicate the results and that would raise questions about the integrity and reliability of the Federal statistical system.[D, Sec. 4]
- The Department of Transportation (DOT) said it would be very costly to document all of the techniques to enable an outside professional to duplicate the results of its surveys.[D, Sec. 4]
- OMB Watch suggested that peer review be substituted for these guidelines.[D, Sec. 4]
- The NSF stated that this reference to models needs to be clarified because it is not clear whether this alludes to only survey models or all models.[D, Sec. 4]
- The Department of the Treasury (IRS) explained that many of its procedures used on tax return data are not available in "cookbook" style and therefore it would be very difficult for a competent professional from the outside to duplicate its procedures and results. [D, Sec. 4]

#### IV. Comments on Compilation, Release, and Evaluation of Principal Federal Economic Indicators [Attachment E]

##### Prompt Release

- In general, NASS contended that OMB is placing more emphasis on timeliness than accuracy. NASS also reported that one of its indicators, at the request of livestock industry representatives, is released on Friday and may not meet the 22 working day limit. [Sec. 4]

##### Announcement of Changes

- NGA insisted Federal agencies should always give users of these data a public comment period whenever a change is contemplated.[Sec. 6]

##### Preliminary Estimates and Revisions

- The ASA wrote that producing a root-mean-square error for estimates based on probability samples can only be done in a few surveys where biases have been measured with a particular accuracy. The ASA also stated that when surveys are based on probability samples, it should always be possible to produce reasonably reliable estimates of standard errors.[Sec. 8]
- William Kruskal, professor of Statistics at the University of Chicago, commented that it may not be desirable to combine bias and sampling error via root-mean-square error and that the circular improperly differentiates between a confidence interval and an interval estimate.[Sec. 8]
- The Census Bureau claimed that only publishing interval estimates would cause confusion for data users.[Sec. 8]

## V. Comments on Use of Standard Classifications, Data Sources, and Definitions [Attachment F]

### Metropolitan Statistical Areas (MSA's)

- HHS (Office of the Secretary) articulated that it would prefer to use the definition of MSA's established every decade in the decennial census for its National Vital Statistics tabulations and that changes in MSA definitions at irregular intervals would require changes in computer processing programs, tabulation programs, and public use data documentation. This could delay the release of the data.[Sec. 2a]
- The Employment Standards Administration (ESA), which contains the Office of Federal Contract Compliance Programs (OFCCP), remarked that the term "MSA" is used by the OFCCP in a nonstatistical manner to evaluate the adequacy of a contractor's definition of a "reasonable recruiting area for a job or job groups." It claimed that the requirement that the agency seek public comment for using the term "MSA" for nonstatistical purposes "may impact OFCCP operations." [Sec. 2a]
- The Census Bureau commended OMB's efforts in this area.[Sec. 2a]

### Standard Classification of Fields of Science and Engineering

- The NSF protested the deletion of this standard classification. It declared that its elimination would yield a proliferation of categories that would undercut the utility of these data to policy-makers. It also warned that this action would inhibit their statutorily mandated responsibility of reporting information to the President and Congress on Federal funding of scientific and engineering research. Finally, It noted that six cabinet departments use these standards not "one or two agencies." [P. 1543, Col. 1]

### Standard Industrial Classification (SIC)

- HHS (Office of the Secretary) maintained that using the Census Bureau's industrial and occupational coding systems comes "closer to meeting our needs" and the new guidelines would be very difficult to comply with.[Sec. 2b]
- The ESA stated that it uses SIC codes for non-statistical purposes "as part of the contractor identifying information." [Sec. 2b]

### Standard Occupational Classification (SOC)

- The Department of Justice (Office of Plans and Analysis) and the Illinois Department of Employment Security said they hoped SOC subsets and similar classification systems would be permitted. [Sec. 2c]
- The NSF urged that the SOC should be revised and updated. [Sec. 2c]
- The DOD recommended that OMB exempt military occupations from this requirement. [Sec. 2c]
- The Office of Personnel Management (OPM) warned that conversion from their current occupational coding standards to the SOC standards "would be dysfunctional and extremely costly." [Sec. 2c]
- The ESA explained that the SOC is "issued by the OFCCP as a reference rather than as any requirement in connection with surveys of data collection." [Sec. 2c]

### Standard Business Size Categories

- The Utah Department of Employment Security predicted that the business size categories would increase the possibility of firm disclosure, especially in smaller states. [Sec. 2d]
- The Equal Employment Opportunity Commission (EEOC) recommended that these categories include an employment size that would allow it to analyze employers with 15 or more employees as required by Title VII of the Civil Rights Act of 1964. [Sec. 2d]

### Racial and Ethnic Categories

- The EEOC articulated several criticisms and recommendations on this topic. First, the Commission objected to the fact that there was no coordination between affected agencies before the proposed circular was published. Second, it urged OMB to restore the five basic definitions of racial/ethnic categories to the guidelines. Third, it stated that the language used in the proposed instructions does not provide the

respondent with clear and consistent guidance. Fourth, it argued that the combined minimum racial/ethnic categories should be returned to prevent possible double-counting. Fifth, it asserted that individuals that identify themselves as "other" should specify what group they identify with so they can be aggregated into other categories. [Sec. 2i]

- William Bradford Reynolds, Assistant Attorney General in the Justice Department's Civil Rights Division, enunciated four major points in regard to this proposed guidelines. First, he called for the restoration of the five basic racial\ethnic definitions. Second, he argued that if these definitions were used, there would be no need for an "other" category. Third, he advocated that the minimum combined format should be returned so the number of black and white Hispanics can be identifiable. Fourth, he asserted that the observer should be able to reverse self-declarations of respondents that were "patently false." [Sec. 2i]
- Representative Augustus Hawkins and eight other members of Congress<sup>4</sup> (Hawkins *et al.*) objected to the elimination of the combined format in Directive 15 because "These combined categories are contained in the Department of Justice's civil rights coordination regulation, Coordination of Enforcement of Nondiscrimination in Federally Assisted Programs [28 CFR 42.202 (e)(1)-(5)], which was issued under the authority of Executive Order 12250." They also protested the category "other" because "the data classified as 'other' will be of little use, since reporting currently is based on groups which have historically suffered discrimination in the United States." Overall, they concluded that "the changes proposed by the circular regarding the collection and reporting of race/ethnic data could severely damage the accuracy and consistency of data used by several agencies to eliminate discrimination ...." [Sec. 2i]
- The Mexican American Legal Defense and Education Fund (MALDEF) had three major objections to this proposed guideline. It stated: 1) OMB should clarify that this guideline will have no application to questions in the 1990 Census questionnaire, 2) The Hispanic identifier should be further subdivided in the same manner as in the decennial census question to prevent the under identification of Hispanics, and 3) The "other" identifier in the racial category should be eliminated because it is confusing and would likely reduce the numbers of blacks, whites, and Asians counted. These "undercounts" would affect affirmative action plans in agencies and elsewhere. [Sec. 2i]
- The DOD disapproved of the deletion of two major items contained in Statistical Policy Directive 15. They were: 1) The definitions of the racial\ethnic categories

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<sup>4</sup>The other Members of Congress were Representatives Jack Brooks, John Conyers, Mervyn Dymally, Don Edwards, Robert Garcia, Matthew Martinez, Edward Roybal, Patricia Schroeder, and Ted Weiss.

and 2) the combined format. It also requested OMB to have respondents specify their race in the "other" category.[Sec. 2i]

- The Women's Legal Defense Fund admonished that the proposed change to "other" "will make the categories less specific and more confusing, thus diluting their effectiveness." It further warned that "The elimination of definitions would cause unnecessary confusion and affect the accuracy of any data collected. The only logical alternative is the retention of definitions." [Sec. 2i]
- The Department of the Army suggested that a more accurate picture of the composition of the Federal work force could be achieved by establishing a requirement that both race and ethnic data be separately collected and reported. It also noted that the SF 181 and OPM form 1468 would have to be revised and the Federal work force resurveyed.[Sec. 2i]
- OPM urged OMB to retain the combined categories and drop the "other" category or make it completely optional.[Sec. 2i]
- The state of Hawaii appealed to OMB to have native Hawaiians categorized with other native groups.[Sec. 2i]
- Runaldo Juarez, associate professor of Sociology at Pan American University, wrote that with the elimination of objective definitions and a combined format, Hispanics may select "other" in the race category and reduce the quality of Hispanic data. He also argued that the new guideline contradicts PL 94-311 which requires statistical agencies to improve the quality of economic and social statistics for Hispanics. [Sec. 2i]
- The State of Connecticut's Office of Planning and Management proposed that this guideline should include a statement that each person is represented in both the racial and ethnic categories and the term "community" should be deleted. [Sec. 2i]
- In addition, there were thirty-five letters calling for a new racial category of "bi-racial" or "multi-racial." [Sec. 2i]
- On the other hand, the Research Foundation of the State University of New York applauded the proposed guideline for reducing the proliferation of categories which require additional detailed record keeping. [Sec. 2i]
- Also, the College of William and Mary strongly supported the addition of the "Other" category. It wrote that the new classification would "relieve a source of tension and frustration on the part of many persons of mixed backgrounds and it would result in more accurate data." [Sec. 2i]

## Standard Industrial Classification of Enterprises (ESIC)

- The Department of the Treasury (IRS) called OMB's discontinuation of this classification system "unfortunate" because it addressed a continuing need for standardization even though only a few federal agencies produce "business" statistics. [p. 1543, Col. 1]

## VI. Comments on Provision of Statistical Data to International Organizations [Attachment G]

NASS and the Peace Corps both wrote that they saw no problems with the new guidelines.



## APPENDIX A: COMPARISON OF CURRENT AND PROPOSED GUIDELINES

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### Current guidelines

### Proposed guidelines

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#### I. PLANNING AND STANDARDS FOR STATISTICAL ACTIVITIES

##### 1. Overview

The standards in this directive are minimal because standards cannot be applied uniformly or precisely in all situations. Special consideration in experimental surveys or in preliminary surveys where the primary purpose is to test the feasibility of alternative approaches or new techniques. However, sponsors should be prepared to justify significant departures from these general standards.

With every request for OMB approval of a statistical survey under the Paperwork Reduction Act [44 U.S.C. 3501-3519] and 5 CFR 1320, the sponsoring agency shall submit supporting documentation to demonstrate that the survey has a useful purpose and is designed to accomplish that purpose as efficiently as possible.

##### 2. Components of the Survey

Agencies should:

Develop the purpose of a survey.

Look at prior and current activities to see if data are available elsewhere.

Develop a survey plan which investigates all of the following issues:

- Target population and extent of coverage.
- Sampling techniques.
- Frequency and timing. The description of the sample design should include cost estimates, sample size, variance estimates, the method of drawing each sample, the method of estimating sample variances, and the methods for controlling and measuring nonsampling error.
- Method of collection.
- Consideration of sampling & non-sampling error. Whenever possible, total mean-square-error should be approximated and potential nonsampling error should be carefully considered.
- Evaluation of survey data.
- Plans for processing and tabulating the data.

The documentation shall include:

The analytical purpose of the survey. Any plans for matching data with administrative records should be articulated here.

The statistical objectives of the survey.

The need for a survey.

The feasibility of a survey.

Justification of the proposed frequency of the survey. If the survey is to be recurring, the sponsoring agency shall submit documentation to demonstrate that:

## Comparison of Current and Proposed Guidelines--Continued

| Current guidelines                                                                                                                                                                        | Proposed guidelines                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>- Allowance for pretests.</li><li>- Provision for follow-up.</li><li>- Proposed calendar.</li><li>- Cost estimates for the entire survey.</li></ul> | <ul style="list-style-type: none"><li>- Measurable changes in the phenomena have occurred between data collections.</li><li>- Estimates could not accurately be made without a survey.</li><li>- The sponsoring agency will accurately publish the data.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Prepare a clear, easy-to-read, easy-to-complete form.                                                                                                                                     | The survey design. The sponsoring agency shall submit documentation to demonstrate that:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| [ <i>Statistical Policy Handbook</i> , Directive No. 1, p. 5-9.]                                                                                                                          | <ul style="list-style-type: none"><li>- The survey will collect data not available from other sources.</li><li>- The survey is designed to satisfy the accuracy requirements of the analysis it is intended to support.</li><li>- Estimates of the variance of key parameters.</li><li>- The survey design is operationally feasible.</li><li>- All potential sources of nonsampling error have been analyzed and adequate steps have been taken to minimize nonsampling error.</li><li>- The proposed design satisfies the survey's objectives in a way that minimizes the burden on respondents.</li><li>- The benefits and costs of a range of possible design options, including alternative sample sizes and data collection techniques have been analyzed.</li><li>- Penalties for nonresponse of mandatory surveys have been developed.</li></ul> |
|                                                                                                                                                                                           | Performance and quality measures. This documentation shall include performance measures such as:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                                                                                                                           | <ul style="list-style-type: none"><li>- Nonresponse rates.</li><li>- Rates of edit failure.</li><li>- Percentage of cases requiring followup.</li><li>- Timeliness measures.</li><li>- A description of the information validation techniques and the quality control procedures used.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                                                                                                                           | Disclosure control techniques. If variables or table cells are to be suppressed, the documentation shall indicate which variables and classifications will be lost.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

## Comparison of Current and Proposed Guidelines--Continued

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### Current guidelines

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### Proposed guidelines

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Quality standards for publishing data.

Processing and reporting of survey data. The documentation shall include:

- The editing and imputation procedures.
- The procedures to be used in preparing estimates based on survey data, including benchmarking, seasonal adjustment methods, and methods for creating composite variables.
- The contents of all the planned products of the survey.

The basis for any pledge of confidentiality.

[53 *Fed. Reg.* 1543-1546, Attachment A]

## Comparison of Current and Proposed Guidelines--Continued

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### Current guidelines

### Proposed guidelines

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## II. TREATMENT OF RESPONDENTS

### 1. Overview

Good relations with respondents involve obtaining the information needed with the minimum burden, reassuring respondents that their interests are being protected, and in general dealing with them fairly and honestly.

These guidelines set forth directions for the treatment of respondents to statistical surveys.

Sponsors of surveys should avoid questions that do not contribute to the survey.

### 2. Informing Respondents

Respondents, if it is the case, should be assured that the information will only be used for statistical purposes.

All of the following information should be provided to potential respondents before they are asked to participate.

Respondents to other types of surveys should be informed of the users of the data and the extent of the disclosure.

- The names of all sponsors of the survey.
- The subject matter of the survey in detail and whether there are any sensitive topics in the survey.
- Whether the survey is one-time or periodic. If it is periodic, the frequency of the survey should be given to the respondent.
- The intended use of the information. This should include whether or not: all the information is to be used for statistical purposes only, all the information is covered under a pledge of confidentiality, and the information is to be matched with administrative records.

If the survey uses mandatory reporting authority, a full quotation of the relevant statutes and regulations should be given to the respondent.

### 3. Protection of Confidentiality

Agencies collecting data from business respondents particularly should be aware of the provisions of the Freedom of Information Act [P.L. 89-487].

The following directions are necessary to ensure the protection of confidentiality and privacy:

## Comparison of Current and Proposed Guidelines--Continued

| Current guidelines                                                                                                          | Proposed guidelines                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Agencies collecting data from individuals should be aware of the provisions of the Privacy Act of 1974 [P.L. 93-579]</p> | <ul style="list-style-type: none"><li>- Each agency should have written policies that proscribe the use of confidential information for non-statistical purposes.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p>OMB requires special justification for questions of a "sensitive nature."</p>                                            | <ul style="list-style-type: none"><li>- Each agency should have written policies and procedures to ensure physical security of information for the agency, contractors, and grantees.</li><li>- Each agency should have a program to ensure that the agency's employees, contractors, and grantees are fully aware of their responsibilities for the safeguarding of individuals.</li><li>- Each agency, before submitting an information collection request to OMB, should have resolved any legal questions affecting its ability to prevent public disclosure of the information.</li></ul> |
|                                                                                                                             | <p>No agency should make a pledge of confidentiality unless:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                                                                                                             | <ul style="list-style-type: none"><li>- It has met the previously listed requirements.</li><li>- It provides a statement to OMB explaining why the information is exempt from the Freedom of Information Act.</li><li>- It includes in the information collection the uniform pledge of confidentiality.</li></ul>                                                                                                                                                                                                                                                                             |
|                                                                                                                             | <p>The following conditions should be met in order for an agency to match data with administrative records:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                                                                                             | <ul style="list-style-type: none"><li>- The match is exclusively for statistical purposes.</li><li>- The sponsor of the survey has informed the respondents that the data will be used in such a way.</li><li>- The matching should be documented in the analytical purpose of the survey.</li></ul>                                                                                                                                                                                                                                                                                           |

## Comparison of Current and Proposed Guidelines--Continued

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### Current guidelines

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### Proposed guidelines

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#### 4. Designing and Conducting Surveys That Use Mandatory Reporting Authority

OMB prohibits any statements that may give the impression that a voluntary survey is mandatory.

When a response is mandatory, the appropriate law that authorizes the survey should be given to the respondent.

[*Statistical Policy Handbook*, Directive No. 1, Section 8a, p. 10]

Any survey that uses mandatory reporting authority should meet the following conditions:

- All people or units of observation should have an equal probability of being included in the survey.
- If the survey requires periodic responses, the sample is drawn at regular intervals not to exceed three years.
- The information that respondents are required to provide includes only factual information that can be obtained from and verified by respondents' records.

[53 *Fed. Reg.* 1546-1547, Attachment B]

## Comparison of Current and Proposed Guidelines--Continued

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### Current guidelines

### Proposed guidelines

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## III. STATISTICAL PUBLICATIONS AND THE DOCUMENTATION OF METHODS AND PROCEDURES

### 1. Overview

The following standards and procedures for the publication of statistics describe practices which should be followed whenever applicable.

This section sets forth guidelines for publishing methods, procedures, and results of statistical surveys.

### 2. Obligation to Publish

Nothing is explicitly stated in the current guidelines.

Agencies should either publish results or make them available upon request in a form that does not reveal information that could identify a respondent. Also, non-published results should be maintained in a data base that is accessible to agencies and the public within 90 days.

No data in a statistical series should be withheld from release unless:

- Suppression is necessary to protect the confidentiality of respondents.
- It fails to meet OMB's qualifications for publication.

The agency should notify users of a suppression and make no use of the data whatsoever.

### 3. Presentation of Statistics

Every release and publication of statistics must clearly indicate the nature of the data and make reference to any detailed technical description. Forecasts and projections must be clearly labelled and preliminary figures noted. Data taken from other sources should be identified. The date of publication and the time reference should be noted. Data taken from other sources should be identified. Technical terms should be defined in the publication or in a separate technical source. In economic or social analyses, there should be a clear distinction between actual data and inferences or interpretations drawn from the data.

There should be a complete presentation of the statistics that includes:

- Clearly labelled data, tables, charts, and graphs.
- Estimates of variances and standard deviations.
- The actual number of observations in each cell.
- Identification of imputed data.
- limitations of preliminary estimates.
- The quantitative difference between preliminary and revised estimates.

## Comparison of Current and Proposed Guidelines--Continued

| Current guidelines                                                                                                                                                                                | Proposed guidelines                                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| <p>Graphs and charts should be clearly labeled with a title, the time period to which the data refer, the geographic area included, and the units used on the vertical and horizontal scales.</p> | <p>In a discussion of findings, the evidence used to support any conclusions should be clear.</p> |

## Comparison of Current and Proposed Guidelines--Continued

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### Current guidelines

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### Proposed guidelines

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#### 4. Documentation of Methods and Procedures

A description of the survey design and methods used in implementing the survey design should be available in a report or in a separate technical source. The description should include:

- What is measured.
- The source(s) of information.
- The sampling plan.
- The method of collecting data.
- The extent of nonresponse and other sources of bias, and the methods used to deal with these problems.

All published studies should include the following documentation:

- The purpose of the study.
- A description of the study design.
- The sources of all statistical data used.
- A description of all adjustments made to the data.
- A discussion of the limitations of the survey or study results.

All documentation of methods and procedures should be kept in a publicly available file and therefore should not contain any information that the agency considers to be exempt from the Freedom of Information Act.

The documentation file on surveys should include:

- All procedures relating to the survey.
- Copies of all forms used.
- Performance statistics used.
- Results of evaluations or quality control audits.

All models, imputation procedures, coding procedures, and procedures used to adjust data acquired through surveys and administrative records should be documented so that a competent professional from outside the agency can duplicate the procedures and results.

All procedures should be documented that are used to generate statistical estimates that are required by statute or by this circular or to be used by federal agencies in making determinations about benefits, obligations, privileges, or right of specific individuals or entities.

## Comparison of Current and Proposed Guidelines--Continued

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### Current guidelines

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### Proposed guidelines

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#### 5. Review of Publications

Any statistical report of any importance should be reviewed by persons who are familiar with the subject matter to detect errors. Such reports should also be reviewed by a statistical expert from the standpoint of the validity and reliability of statistical statements and conclusions. Analytical reports based on data from sample surveys should be carefully reviewed to avoid inclusion of statements which fail to take proper account of sampling errors and other limitations. Accuracy of the data should be discussed, including sampling and non sampling errors. Finally, when a statistical series is revised, the character and effect on the series must be explained.

[*Statistical Policy Handbook*, Directive No. 2, p. 11-12]

Agencies that regularly issue statistical publications should establish a formal review process with written procedures and specific assignments of responsibility. This process of review of publications should provide for independent review of each publication by at least one competent professional who was not involved in the preparation of the publication or the survey or study on which it is based.

[53 *Fed. Reg.* 1547-1549, Attachments C and D]

## Comparison of Current and Proposed Guidelines--Continued

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### Current guidelines

### Proposed guidelines

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#### IV. COMPILATION, RELEASE, AND EVALUATION OF PRINCIPAL FEDERAL ECONOMIC INDICATORS

##### 1. Overview

The purpose of the procedures outlined is to assume that these data series meet specific accuracy, release, and accountability standards.

The purpose of the procedures outlined is to assure that these data series meet specific accuracy, release, and accountability standards.

##### 2. Designation of Principal Federal Economic Indicators

The Administrator of the Office of Information and Regulatory Affairs (OIRA), along with the director of OMB, after consultation with interested federal agencies, will determine the data series and estimates to be designated as principal Federal Economic Indicators. The administrator of OIRA will review the designations annually.

The Director of OMB, after consultation with interested federal agencies, will determine the data series and estimates to be designated as principal Federal Economic Indicators and the scheduled date for the release of each indicator.

##### 3. Prompt Release

Agencies that publish indicators shall follow the succeeding guidelines:

- Reports should be issued within 22 working days of the reference period.
- Publish in each release the time and date of the next release.
- A schedule of release dates must be presented to OMB before December 15th for the upcoming calendar year.

Agencies that publish indicators shall follow the succeeding guidelines:

- Reports should be issued within 22 working days of the reference period.
- Publish in each release the time and date of the next release.
- A schedule of release dates must be presented to OMB before November of the upcoming calendar year.

##### 4. Announcement of Changes

Agencies shall announce any planned change in data collection, analysis, or estimation methods that may affect the interpretation of a principal Federal Economic Indicator as far in advance as possible. The agency should include the announcement in a regular report of the indicator and when possible a period of public comment should be provided between the announcement and implementation.

Agencies shall announce any planned change in data collection, analysis, or estimation methods that may affect the interpretation of a principal Federal Economic Indicator as far in advance as possible. The agency should include the announcement in a regular report of the indicator and when possible a period of public comment should be provided between the announcement and implementation.

## Comparison of Current and Proposed Guidelines--Continued

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### Current guidelines

### Proposed guidelines

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#### 5. Release Procedure

Each agency should issue an economic indicator in a press release and should be responsible for developing procedures to ensure that there will be no pre-release of the data. Agencies may grant pre-release under the following conditions:

- The agency head establishes proper security arrangements.
- The agency head shall ensure that any person granted access has been fully informed of the security arrangements.
- Any pre-release of information under embargo shall not precede official release time by more than 30 minutes.
- In all cases, pre-release access shall precede the official response only to the extent necessary for an orderly review.

All employees of the executive branch shall not comment publicly on the data until one hour after release time.

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- The agency head establishes proper security arrangements.
- The agency head shall ensure that any person granted access has been fully informed of the security arrangements.
- Any pre-release of information under embargo shall not precede official release time by more than 30 minutes.
- In all cases, pre-release access shall precede the official response only to the extent necessary for an orderly review.

All employees of the executive branch shall not comment publicly on the data until one hour after release time.

#### 6. Preliminary Estimates and Revisions

Agencies shall use the following guidelines when issuing and evaluating preliminary data and revisions:

- Agencies shall clearly identify figures as preliminary or revised.
- Agencies shall only release routine revisions as part of a regular reporting schedule.
- The agency must take steps to improve the accuracy of preliminary estimates if the differences are large relative to average period-to-period differences.
- If preliminary estimates show signs of consistent bias, the agency shall take steps to correct the bias.
- Revisions occurring for routine reasons, such as benchmarking and updating seasonality factors shall be consolidated and released simultaneously.

There should not be unnecessary accuracy requirements on preliminary data.

In the case of estimates based on probability samples, agencies should publish measures of uncertainty based on sampling variance and consideration of nonsampling errors, e.g. a root-mean-square error estimate or its equivalent.

In cases where the confidence interval about any single point estimate cannot be estimated, results should be presented only in the form of interval estimate.

Methods used to estimate upper and lower bound values that define the interval estimate should be designed to meet these three objectives:

## Comparison of Current and Proposed Guidelines--Continued

| Current guidelines                                                                                                                                                      | Proposed guidelines                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>- Revisions occurring for non-routine reasons shall be fully explained and released as soon as corrections can be made.</li></ul> | <ul style="list-style-type: none"><li>- Preliminary estimates should include the final point estimate with high probability.</li><li>- The width of the interval should be consistent with the error history of the indicator.</li><li>- The bound values should be consistent with any confidence intervals that can be estimated for components of the indicator.</li></ul> <p data-bbox="1005 471 1820 531">For either point or interval estimates, agencies shall apply the following guidelines when issuing and evaluating preliminary data and revisions:</p> <ul style="list-style-type: none"><li>- Agencies should clearly identify estimates as preliminary or revised.</li><li>- If the difference between preliminary and final aggregate estimates, or the width of a preliminary interval estimate, is large relative to average period to period differences, the agency should either take steps to improve the accuracy of preliminary estimates or delay the release of the estimates until a reliable estimate can be made.</li><li>- If preliminary estimates show signs of constant bias in the same direction, the agency should take steps to eliminate this bias.</li><li>- Revisions occurring for routine reasons, such as benchmarking and updating seasonality factors, should be consolidated and released simultaneously.</li><li>- Agencies should release routine revisions of a principal economic indicator only as part of the regular reporting schedule.</li><li>- Revisions occurring for other than routine reasons should be fully explained and should be released as soon as adjustments can be completed.</li></ul> |

### 7. Granting of Exceptions

The administrator of OIRA may grant exceptions to some sections of this directive.

The Director of OMB will review any request for exceptions to these guidelines.

## Comparison of Current and Proposed Guidelines--Continued

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### Current guidelines

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### Proposed guidelines

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#### 8. Performance Evaluation

Each agency that issues a principal economic indicator shall submit a performance evaluation of that indicator every three years.

OMB shall issue a schedule of these evaluations.

The evaluations shall address the following issues:

- The accuracy and reliability of the series.
- The accuracy, completeness, and accessibility of the documentation.
- The agency's performance in meeting the designated release schedule and prompt release guidelines.
- The agency's ability to avoid premature disclosure.
- Any additional issues the Director of OMB may specify at least 6 months in advance.

OMB will include a summary of the year's evaluations and reviews in the annual report to Congress.

[50 *Fed. Reg.* 38932-38934]

Each agency that issues a principal economic indicator shall submit a performance evaluation of that indicator every three years.

OMB shall issue a schedule of these evaluations.

The evaluations shall address the following issues:

- The accuracy and reliability of the series.
- The accuracy, completeness, and accessibility of documentation.
- The agency's performance in meeting the designated release schedule and prompt release guidelines articulated in this circular.
- The agency's ability to avoid premature disclosure.
- Any additional issues the Director of OMB may specify at least 6 months in advance.

OMB will include a summary of the years evaluations and reviews in the annual report to Congress.

[53 *Fed. Reg.* 1549-1550, Attachment E]

## Comparison of Current and Proposed Guidelines--Continued

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### Current guidelines

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### Proposed guidelines

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## V. USES OF STANDARD CLASSIFICATIONS, DATA SOURCES, AND DEFINITIONS

### 1. Metropolitan Statistical Areas (MSAs)

The criteria followed and the definitions of SMSAs and SCSAs are presented in the OFSPS publication *Standard Metropolitan Statistical Areas*, revised 1975 edition.

MSAs shall not be used in the administration of any non-statistical program unless the head of an agency has determined that it is appropriate to achieve a program's objectives.

If the term "metropolitan area" is used and refers to MSAs, a definition of an MSA should accompany any reference to the term.

[*Statistical Policy Handbook*, Directive No. 7, p. 21]

All agencies that publish data for MSAs should use the most current definitions provided by OMB.

If an agency wants to use MSAs for a non-statistical purpose, it should first seek public comment and then all modifications should be identified as derivations from OMB definitions.

[53 *Fed. Reg.* 1550-1552, Attachment F, Section 2a]

### 2. Standard Industrial Classification (SIC)

Details are presented in the SIC manual (1972), issued by OMB along with other supplements.

SIC should not be used for non-statistical purposes unless the Secretary of Commerce has determined that it is appropriate to achieve a program's objectives.

[*Statistical Policy Handbook*, Directive No. 8, p. 23]

All agencies shall use the most up to date SIC manual.

If an agency wants to use SIC for a non-statistical purpose, it should first seek public comment and then all modifications should be identified as derivations from OMB definitions.

When requesting clearance for the use of SIC for non-statistical purposes, the agency must demonstrate that it has sufficiently trained personnel.

[53 *Fed. Reg.* 1550-1552, Attachment F, Section 2b]

## Comparison of Current and Proposed Guidelines--Continued

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### Current guidelines

### Proposed guidelines

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#### 3. Standard Occupational Classification (SOC)

Details are presented in the SOC manual (1977), issued by OFSPS.

SOC should not be used for non-statistical purposes unless the Secretary of Commerce has determined that it is appropriate to achieve a program's objectives.

[*Statistical Policy Handbook*, Directive No. 10, p. 27]

All agencies should use the most up to date SOC manual.

If an agency wants to use SOC for a non-statistical purpose, it should first seek public comment and then all modifications should be identified as derivations from OMB definitions.

When requesting clearance for the use of SOC for non-statistical purposes, the agency must demonstrate that it has sufficiently trained personnel.

[53 *Fed. Reg.* 1550-1552, Attachment F, Section 2c]

#### 4. Standard Payroll Reporting Period

Agency requests to employers for data from their payroll records to be used for statistical purposes should refer to the payroll period containing the 12th of the month.

[*Statistical Policy Handbook*, Directive No. 12, p. 31]

Agency requests to employers for data from their payroll records to be used for statistical purposes should refer to the payroll period containing the 12th of the month.

[53 *Fed. Reg.* 1550-1552, Attachment F, Section 2c]

#### 5. Source of Population Data for Use in the Administration of Federal Programs

Executive departments and establishments, in distributing and/or determining eligibility for federal benefits shall use the most current and comprehensive data published by the Bureau of the Census.

Agencies shall request approval of the Secretary of Commerce to use any other data that represents total population.

Any new legislation developed by agencies shall be consistent with the principles outlined in this guideline.

[*Statistical Policy Handbook*, Directive No. 13, p. 33]

Agencies that are required by law to allocate federal funds or determine eligibility for federal benefits on the basis of population should use the most current population estimates published by the Bureau of the Census.

If total population is used with other variables in a formula, all the variables shall refer to the same year, which shall be the most recent year for which data are available.

[53 *Fed. Reg.* 1550-1552, Attachment F, Section 2f]

## Comparison of Current and Proposed Guidelines--Continued

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### Current guidelines

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### Proposed guidelines

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#### 6. Standard Source of Labor Force and Unemployment Estimates for Use in the Administration of Federal Programs

Federal Executive branch departments, agencies, and establishments, in distributing and/or determining eligibility for federal benefits shall use the most current and comprehensive data published by the Bureau of Labor Statistics (BLS).

Agencies requiring labor force or unemployment data shall notify the commissioner of BLS of their need.

[*Statistical Policy Handbook*, Directive No. 11, p. 29]

Agencies that are required by law to allocate federal funds or determine eligibility for federal benefits on the basis of employment, unemployment, or labor force participation levels should use the most current estimates provided by BLS.

[53 *Fed. Reg.* 1550-1552, Attachment F, Section 2g]

#### 7. Definition of Poverty

The basis for the poverty statistical series has been the classification of income data, collected by the Bureau of the Census, in accordance with a definition of poverty developed by the Social Security Administration and revised by a Federal Interagency Committee in 1969.

The differential between poverty levels for farm and non-farm families is reduced 30-15 percent.

Annual adjustments in the census series are based on changes in the average annual consumer price index (CPI).

Other measures of poverty may be developed as long as they are distinguishable from the standard data series and not used for administrative purposes.

[*Statistical Policy Handbook*, Directive No. 14, p. 35]

Agencies that are required by law to use the definition of poverty established by OMB should continue to use as the definition of poverty the annual income thresholds that for 1986 and prior years have been published by the Bureau of the Census. For 1987 and subsequent years, the definition of poverty shall be the 1986 thresholds adjusted annually by the year over year change in the CPI for all urban consumers.

[53 *Fed. Reg.* 1550-1552, Attachment F, Section 2h]

## Comparison of Current and Proposed Guidelines--Continued

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### Current guidelines

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### Proposed guidelines

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#### 8. Racial and Ethnic Categories

The following guidelines provide standard classification for all recordkeeping and data collection for all administrative and statistical activities.

This directive provides basic definitions for the racial and ethnic categories of American Indian or Alaskan Native, Asian or Pacific Islander, Black, Hispanic, and White

To provide flexibility, it is preferable to collect data on race and ethnicity separately. The minimum designations are:

Race:

- American Indian or Alaskan Native
- Asian or Pacific Islander
- Black
- White

Ethnicity:

- Hispanic Origin
- Not of Hispanic Origin

When race and ethnicity are collected separately, the number of white and black persons who are hispanic must be identifiable.

If a combined format is used to collect racial and ethnic data, the minimum acceptable categories are:

- American Indian or Alaskan Native
- Asian or Pacific Islander
- Black, not of Hispanic Origin
- Hispanic
- White, not of Hispanic Origin

Agencies should use the following categories for all purposes that require classifying people by racial or ethnic background.

A person's racial or ethnic background is determined by the way in which the person chooses to identify himself/herself.

Racial Categories:

- American Indian or Alaskan Native
- Asian or Pacific Islander
- Black
- White

Ethnic Categories:

- Hispanic
- Not of Hispanic Origin

In establishing reporting systems and collecting data, agencies should permit individuals to identify themselves as "other" if they believe they do not fall into one of the categories.

Agencies may use other, more detailed categories as long as they can be aggregated into the aforementioned basic categories.

[53 Fed. Reg. 1550-1552, Attachment F, Section 2i]

## Comparison of Current and Proposed Guidelines--Continued

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### Current guidelines

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### Proposed guidelines

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These minimum standard collection categories shall be utilized for:

- 1) Civil rights compliance reporting.
- 2) General program administration and grant reporting.
- 3) Statistical reporting.

All exceptions must be approved by the Office of Federal Statistical Policy and Standards or OMB. Also, the reporting category "All Other Races" can only be used under certain conditions and "non-white" is unacceptable.

[*Statistical Policy Handbook*, Directive 15, p. 37]

### 9. Standard Industrial Classification of Enterprises

The Enterprise Standard Industrial Classification is to be used to classify enterprises by kind of activity in which engaged. The classification of enterprises, rather than their constituent establishments, is required for purposes of compiling and analyzing financial and related statistics (e.g. income, expense, and monthly balance sheet items) which are commonly available only on an enterprise level. The structure of classification makes it possible to publish data on enterprises by industry, according to the degree of industrial detail available and needed.

Details are available in the ESIC manual (1974), issued by OMB.

[*Statistical Policy Handbook*, Directive No. 8, 23]

Discontinued by OMB Circular because the "current standards have not proven useful for the statistical purposes intended."

[53 *Fed. Reg.* 1543]

## Comparison of Current and Proposed Guidelines--Continued

| Current guidelines                                                                                                                                                                                                           | Proposed guidelines                                                                                                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| <b>10. Standard Federal Administrative Regions</b>                                                                                                                                                                           |                                                                                                                            |
| Agencies which publish data on states should do so on the basis of the 10 Standard Federal Administrative Regions.                                                                                                           | Discontinued by OMB Circular because the "current standards have not proven useful for the statistical purposes intended." |
| [ <i>Statistical Policy Handbook</i> , Directive No. 6, p. 19]                                                                                                                                                               | [53 Fed. Reg. 1543]                                                                                                        |
| <b>11. Standard Reference Base Period for Federal Government General-Purpose Index Numbers</b>                                                                                                                               |                                                                                                                            |
| The year 1967 shall be the standard reference base period for general purpose index numbers prepared by federal agencies.                                                                                                    | Discontinued by OMB Circular because the "current standards have not proven useful for the statistical purposes intended." |
| [ <i>Statistical Policy Handbook</i> , Directive No. 5, p. 17]                                                                                                                                                               | [53 Fed. Reg. 1543]                                                                                                        |
| <b>12. Standard Gas Pressure Base</b>                                                                                                                                                                                        |                                                                                                                            |
| The standard gas pressure base for government use is 14.73 pounds per square inch absolute at 15.6 degrees celsius. This base will be used by all federal agencies when collecting or publishing information on natural gas. | Discontinued by OMB Circular "because they are used by only one or two agencies to collect and publish statistics."        |
| [ <i>Statistical Policy Handbook</i> , Directive No. 17, p. 41)]                                                                                                                                                             | [53 Fed. Reg. 1543]                                                                                                        |

## Comparison of Current and Proposed Guidelines--Continued

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### Current guidelines

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### Proposed guidelines

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#### 13. Standard Classification of Fields of Science and Engineering

Federal agencies collecting financial information on research and development are expected to use a two digit classification scheme when requesting information on fields of science.

[*Statistical Policy Handbook*, Directive No. 16, p39]

Discontinued by OMB Circular "because they are used by only one or two agencies to collect and publish statistics."

[53 *Fed. Reg.* 1543]

#### 14. Standard Business Size Categories

When publishing statistics, agencies should use these standard business size categories. The two categories measure revenues or assets and number of employees.

Agencies may combine adjacent size categories or truncate the size scale if there is a limited scope to the data, a need to ensure confidentiality of individual responses, or a very large sample variability. Any changes should be noted in the affected publication.

[47 *Fed. Reg.* 21362-21363]

When publishing statistics, agencies should use these standard business size categories. The two categories measure revenues or assets and number of employees.

Agencies may combine adjacent size categories or truncate the size scale if there is a limited scope to the data, a need to ensure confidentiality of individual responses, or a very large sample variability. Any changes should be noted in the affected publication.

[53 *Fed. Reg.* 1550-1552, Attachment F, Section 2d]

## Comparison of Current and Proposed Guidelines--Continued

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### Current guidelines

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### Proposed guidelines

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#### VI. PROVISION OF STATISTICAL INFORMATION TO INTERNATIONAL ORGANIZATIONS

The Director of OFSPS can waive any of the requirements of this directive. Any department or establishment furnishing statistical information to an international organization in response to an official request will do so only when pursuant to a prior determination by the director. Exceptions concern the following: advance determinations, requests from the international financial institutions, and special arrangements.

Any international organization requesting statistical information must go through established channels authorized by the Secretary of State. Requests from the International Monetary Fund, the International Bank for Reconstruction and Development, and other financial institutions are excepted from this provision.

[*Statistical Policy Handbook*, Directive 18, p. 43-45]

The Director of OMB, with the concurrence of the Secretary of State, will determine what statistical information shall be provided in response to official requests received by the United States Government from international organizations.

Agencies that have not been designated by the director to prepare statistical information for an international organization, must have each new request cleared with OMB.

[53 *Fed. Reg.* 1552, Attachment G]

## APPENDIX B: LIST OF RESPONDENTS

### U.S. GOVERNMENT

Congress of the United States: Augustus Hawkins *et al.*

#### Department of Agriculture

Economic Research Service: John Lee

National Agricultural Statistics Service: Charles Caudill

Food and Nutrition Service: John Franke

Agricultural Cooperative Service: Charles Kraenzle

Food and Nutrition Service: Joseph Leo and Thomas Sullivan

Department of the Army: Linda Kries

#### Department of Commerce: Robert Brumley

Bureau of the Census

Bureau of the Census: Charlie Jones

Bureau of Economic Analysis: Allan Young

International Trade Administration: Charles Cobb

Assistant Secretary for Economic Development: Orson Swindle

Consumer Product Safety Commission: Leonard DeFiore

Department of Defense: Assistant Secretary of Defense: Robert Helm

#### Department of Education

Office of the Assistant Secretary

for Educational Research and Improvement: Emerson Elliot

Department of Energy: Harry Peebles

Environmental Protection Agency: Ken Sexton, Linda Fisher

Equal Employment Opportunity Commission: Elizabeth Thornton

Federal Communications Commission: Edward Minkel

#### Department of Health and Human Services

Office of the Secretary: S. Anthony McCann

Office of the Secretary: Richard Riseberg

Public Health Service: Harald Loe

Public Health Service: Z. Erik Farag

Department of Housing and Urban Development: Donald Demitros

Department of the Interior: Oscar Mueller

Department of Justice

Bureau of Justice Statistics: Steven Schlesinger

Civil Rights Division: William Bradford Reynolds

Office of Juvenile Justice and Delinquency Prevention: Verne Speirs

Office of Plans and Analysis: John Nahan

Drug Enforcement Administration: S.W. Hinckley

Office of Justice Programs: Charles Lauer

Department of Labor

Bureau of Labor Statistics: Janet Norwood

Employment Standards Division (OFCCP): Fred Alvarez

National Academy of Sciences: National Research Council: Burton Singer

National Archives: Don Wilson

National Labor Relations Board: Ernest Russell

National Research Council: Burton Singer

National Science Foundation: Charles Dickens

Occupational Safety and Health Review Commission

Office of Personnel Management: Claudia Cooley

Peace Corps: Margaret Thome

Department of Transportation: Jon Seymor

Department of the Treasury

Graham Clark

Internal Revenue Service: Fritz Sheuren

Internal Revenue Service: Fritz Sheuren

Veterans Administration

David Cox

Norman Minard

## STATE AND LOCAL GOVERNMENT

Arizona Department of Economic Security  
Atlanta Regional Commission  
State of California: Health and Welfare Agency  
State of Connecticut: Office of Policy and Management  
State of Hawaii: Office of Hawaiian Affairs  
Illinois Department of Employment Security  
Los Angeles County District Attorney: Mario Uribe  
State of New York: Department of Labor  
State of Utah  
    Utah Department of Employment Security  
    Utah Department of Health

State of Washington: Employment Security Department

## ACADEMIC: RESEARCH COMMUNITY

Albert Einstein College of Medicine of Yeshiva University: Dr. Blaurox  
The College of William and Mary: W. Sadler  
Columbia University: Joseph Fleiss  
The George Washington University: Joseph Gastwirth  
Harvard University: Patricia Tucker  
John B. Pierce Foundation Laboratory  
University of Chicago  
    Bruce Spencer (NORC)  
    William Kruskal  
Pan American University: Runaldo Juarez  
Pittsburgh State University: Robert Walter  
The Research Foundation of the State University of New York: Winifred Widmer  
Simmons College: Peter Hernon  
Syracuse University (School of Information Studies): Charles McClure  
University of California, Berkeley  
    David Mears  
    Percy Tannenbaum  
University of California, Los Angeles  
    Abdelmonen Afifi  
    G. Reginald Daniel  
University of Illinois at Chicago: Jacob Brody  
University of Michigan: Institute for Social Research: Phillip Converse  
University of Texas Health Science Center at Houston  
    R.W. Butcher  
    C. Hawkins et al  
Wharton School of the University of Pennsylvania: Abba Krieger

University of Washington: Norman Breslow *et al*  
Yale University: I. Richard Savage

## EPIDEMIOLOGICAL COMMUNITY

John Gardner  
Barbara Grajewski  
Harvard School of Dental Medicine: Chester Douglas  
Henry Ford Hospital: Barbara Tilley *et al*  
Carol Hogue  
Johns Hopkins Medical Institutions: Thomas Pearson  
Northeastern Ohio Universities- College of Medicine  
Claire Bourget  
Lowell Gerson  
Everett Logue  
Society for Epidemiological Research: Carol Hogue  
University of California, San Diego  
Elizabeth Barret-Connor  
Michael Criqui  
University of Hawaii at Manoa  
James Banta  
F. Miller  
Yale New Haven Hospital: Stuart Shalat  
Yale University  
Sarah Horwitz  
Dwight Janerich  
James Jekel  
Lorraine Klerman

## MULTI-BI-RACIAL CATEGORIES

Jimmy Alban  
American Civil Liberties Union: Tammy Morag and Elizabeth Symonds  
Marykay Bell  
Bridget Carr  
Irene Carr  
Michael Carr  
Stephen and Celesta Cheney-Rice  
Irene Davis  
Ramona Douglas  
Patricia Edwards  
Elaine Flowers

Jack Geter  
Karin Geter  
Carleton Harris  
Dana Henderson  
Marcus Henderson  
Honoring Our New Ethnic Youth (HONEY): Donna Mittasch  
Linda and Clarence Innis  
Interracial Connection: Connie Smith  
Interracial Family Alliance: John Brown  
Interracial Family Circle: Joan Gordon *et al.*  
Interracial Family Unity Network  
Christina Leimer  
Marcia Livingston  
Linda Mahdesian  
Conny McClary  
Henry McClary  
Multi-racial Americans of Southern California (M.A.S.C.): Nancy Brown  
Mary Murchison-Edwards  
Dale Oke  
Elizabeth Radcliffe  
Ronald Radcliffe  
R.C. Robinson  
Charles Salone and Jo Ann Smith  
Spectrum: Evelyn Thompson

#### NON-PROFIT

American Association of Dental Schools: Richard Mumma  
American Association of Public Health Dentistry: Michael Easley  
American Association for Public Opinion Research: Eleanor Singer  
AFL-CIO: Markley Roberts  
American Library Association: Eileen Cooke  
American Psychological Association: Alan Kraut  
American Public Health Association  
    William McBeath  
    Phillip Leaf  
The American Sociological Association: William D'Antonio  
The Association of State and Territorial Dental Directors: Gregory Connolly  
American Statistical Association  
    Monroe Sirken  
    Edward Spar  
Association for Vital Records and Health Statistics: Mary Anne Freedman  
Consortium of Social Science Associations: Howard Silver  
Council on Government Relations: Milton Goldberg

Council of Professional Associations on Federal Statistics

Kathy Wallman

Richard Rockwell

The Gerontological Society of America: John Cornman

Mexican American Legal Defense and Education Fund: G. Mario Moreno

National Committee on Vital Statistics: Ronald Blankenbaker

National Governors Association: Raymond Scheppach

OMB Watch: Shannon Ferguson

Sacramento Blood Center: Paul Holland

BUSINESS

AT&T: Robert Morgan

Cincinnati Gas & Electric Company: Daniel Herche

Carolina Power & Light Company: Norris Edge

Du Pont: H.D. Minton

Dynamet, Inc.: Robert Dickson

Edison Electric Institute: Gary Knight

Financial Executives Institute: Robert Harris

Marathon Oil Company: Timothy Coburn

Pollack Associates: Earl Pollack

Pennsylvania Power & Light Company: R.E. Hill

Professional Services Council: Virginia Littlejohn

Virginia Power: C.M. Jarvis

PRIVATE INDIVIDUALS

Martin Becker

R.C.E.

Sam Marcus

T.J.Skinner (Australian Bureau of Statistics)

Theodore Woolsey